

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**  
Philadelphia Division

Stephanie T. Fryer,

*Debtor.*

Chapter 13  
Case No. 21-11319-AMC

**Motion to Modify Plan After Confirmation**


Debtor Stephanie T. Fryer, through her attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on May 7, 2021. The plan was confirmed on November 18, 2021. The plan is a 100% plan excluding student loans.
2. The Trustee recently filed a motion to dismiss this case for failure to make plan payments.
3. The Debtor wants to amend her plan to resolve the dismissal motion.
4. The proposed plan cures the arrearage that gave rise to the dismissal motion by increasing the Debtor's monthly plan payments moving forward, corrects an erroneous one cent surplus in part 4(b) of the plan, corrects the amount to be paid to unsecured creditors to include the unsecured portion of the Internal Revenue Service's claim, corrects an erroneous two dollar and eighty-nine cent deficit in the estimated trustee's commission, and lowers the base plan amount to the actual sum of the plan's total distributions and the estimated trustee's commission.
5. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 55 as the new confirmed plan.
6. The Debtor will soon file a supplemental Schedule J as evidence of the Debtor's ability to fund the new plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: November 26, 2024

CIBIK LAW, P.C.  
*Counsel for Debtor*

By:   
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